

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Lance Craig Mahone, Jr.

Case No.

Case: 2:23-mj-30436

Assigned To : Unassigned

Assign. Date : 10/27/2023

Description: RE: SEALED MATTER
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 29, 2022 in the county of Wayne and Oakland in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. §§ 2251

18 U.S.C. § 2252A(a)(2)

~~18 U.S.C. § 2260A~~ DRG

18 U.S.C. § 1591 and 1594

18 U.S.C. § 1028A

Sexual exploitation of children

Distribution and receipt of child pornography

~~Failure to Register as a sex offender~~ DRG

Sex trafficking of a minor/attempted sex trafficking of a minor

Aggravated identity theft.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: October 26, 2023City and state: Detroit, Michigan*Complainant's signature**Special Agent, Jeremy Jaskulski (FBI)**Printed name and title**Judge's signature**Hon. David R. Grand, U.S. Magistrate Judge**Printed name and title*

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Jeremy Jaskulski, a Special Agent with the Federal Bureau of Investigation (FBI) being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since March 2018. I am assigned to the Detroit Division’s Southeast Michigan Trafficking and Exploitation Crimes (SEMTEC) Task Force. While employed by the FBI, I have investigated federal criminal violations related to human trafficking, child exploitation, child pornography and firearms violations. I have gained experience through training and everyday work relating to conducting human trafficking and child exploitation investigations.

2. I have received training in the area of the child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing criminal laws, including 18 U.S.C. §§ 1591, 2251, 2252A, 2260A, and 1028A. I am authorized by law to request an arrest warrant.

3. This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for LANCE CRAIG MAHONE, JR. (DOB: 11/23/1988) (hereinafter “MAHONE”) for violations of 18 U.S.C. § § 2251 (sexual exploitation of children); 2252A(a)(2) (distribution of child pornography); 2260A (penalties for registered sex offenders); 1591 and 1594 (sex trafficking of a minor/attempted sex trafficking of a minor), and 1028A (aggravated identity theft).

4. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information and my experience, training, and background as a Special Agent.

5. This affidavit is supported for the limited purpose of securing an arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that Mahone has violated Title 18 U.S.C. §§ 1591 and 1594, 2251, 2252A(a)(2), 2260A, and 1028A.

PROBABLE CAUSE

6. In June 2022, SEMTEC obtained a search warrant for MAHONE’s person and cell phone.

7. Pursuant to the search warrant, on June 14, 2022, members of SEMTEC seized MAHONE's iPhone cell phone.

8. Subsequent review of the contents of MAHONE's iPhone identified communications between MAHONE and a minor female, Minor Victim One (MV-1), born in 2006, as well as child pornographic images of MV-1.

9. MAHONE's phone contained over 2,000 iMessages between MAHONE and MV-1. The messages were exchanged between January 19, 2022 and March 5, 2022. On or about January 24, 2022, MAHONE asked MV1: "You ever tried to model?" MAHONE told MV-1: "You could make hella money." He told her: "From what you showed me, a couple dollars invested and you could make some shit happen." MAHONE then asked MV-1 for pictures, specifically: "bra n panties, feet, naked," "any nudes," "any titties or full nude." MAHONE told MV-1 that people online would pay for her photographs and videos, and the MAHONE would "market the fuck outta you."

10. MAHONE's phone also contained text messages that he sent to MV-1 suggesting that he could set up commercial sex dates for her. He wrote: "Would you be cool with make a couple bands a day if a couple guys wanted to see you"; "I have clients tryna pay 600 right now to see you in person for 30 mins"; "These clients are rich."; "I get the deposit before you even see them/I drive and secure you/And screen all callers to make sure it's not a dummy mission/Trust me. I don't

fuck around when it comes to this money”; “I had a clients pay 3500 and gave me a lb of tree [emoji] no [emoji].” When MV-1 asked “For what,” MAHONE responded: “For meetups.” MAHONE then asked: “Would do meetups with my clients tho?” MAHONE sent an Apple Pay image, and then wrote: “The Money be soo good, it be feeling like it’s too good to be true”; “I only work a job just to show proof of income;” and “If you with this shit fr, ima work hard asf for you and you can see the same type of [money bag emoji].”

11. On or about January 27, 2022, MAHONE asked MV-1: “When could you be available,” and she responded: “U still never told me wat was happening.”

MAHONE answered “He just wanna fuck for a couple mins.” MAHONE asked: “Can I book you for multiple appointments for the day?” MAHONE also wrote: “You want your own place or want move out I can help”; “However you wanna play it. I can help you get your own place or you can move into mine”; “I can fix your credit, get you some pay stubs, and we find another spot downtown. Yeah I got 4 bedrooms and 2 bathrooms”; “By the end of Friday, it should be around \$3500 lined up for the weekend. And we can still have the pictures and videos on deck to be sold too.”

12. Still on or about January 27, 2022, MAHONE told MV-1 “think of a nickname,” and then suggested: “Creamy K?” He said: “Cool. Ima have you posted by the end of the day. Can you make some more pictures and videos so I

can post?"; "I need videos of twerking no panties. Stand up nudes. Fingering. More titty shots." MAHONE also asked: "What are you not willing to do? I have to let clients know. Some be into raw, anal, other stuff"; "Gangbangs." MAHONE said: "I have \$300 session. it's two dudes. You want that first?"

13. On or about February 12, 2022, MAHONE told MV-1: "I was gonna work on posting everything on your onlyfans today"; "Your page is made"; "We need to get your hair done today." MAHONE also wrote: "Now you acting like I'm fucking you for free. I asked you if you wanted to fuck me and you said okay. You know it's for content" and "I just paid somebody \$500 to make that page for me. So it's getting posted regardless."

14. On or about February 12, 2022, MAHONE sent MV-1 a screenshot of a local news article about MV-1 that described her as a missing minor. MAHONE asked MV-1: "Why did you lie about your age?" MAHONE told MV-1 he "looked up your name"; "Because I knew something wasn't right anymore when you said you wanted a fake ID." MAHONE asked MV-1 "when is your birthday fr," and she responded with her date of birth. Then she wrote: "I jus turned 16." MAHONE responded "Yeah you still got a whole life ahead of you. If you want, I'll show you how to make money but it'll be legit"; "I can line you up with people that show how to get rich by the time your 25." MV-1 said: "I'm only 16 tho."

15. On or about February 13, 2022, MAHONE asked MV-1: “Can you come out”; “For whatever”; “Really to chill.” MAHONE also asked: “You ever been in a threesome???”; “Nor a train?”; “That was gonna be a bad experience for the money [laughing emojis]”.

16. On or about February 23, 2022, MAHONE asked MV-1: “You want some money?” MV-1 responded: “Doin wat.” MAHONE sent three emojis in response: an eggplant, a tongue, and a water squirt; based on my training and experience, I know that MAHONE was asking MV-1 if she was willing to perform oral sex. MV-1 asked: “With who,” and MAHONE responded: “A few people.” When MV-1 asked: “How much we talking,” MAHONE responded: “\$40”; “Per person.” MAHONE then asked her: “Have you been getting comfortable with [eggplant emoji] [tongue emoji]”; “Have you been practicing.”

17. Also on or about February 23, 2022, MAHONE asked MV-1: “You got anymore videos?” When she said: “No I don’t have anymore,” he wrote: “Can you make some.”

18. On or about February 24, 2022, MAHONE wrote to MV-1: “I got some money for you when you free.” When MV-1 said: “Doin wat” and MAHONE responded with an eggplant emoji and a tongue emoji. He also wrote: “Wend me a video or pic.”

19. On July 26, 2022, MV-1 spoke with a child forensic interviewer. During the forensic interview, MV-1 identified a photograph of MAHONE as a man known to her as “Vic,” whom she met in January 2022 through BLK, an online dating application. MV-1 further stated:

- a. She initially told MAHONE that she was 18 years old;
- b. She used her iPhone to communicate with MAHONE over iMessage;
- c. MAHONE told MV-1 she could make money by selling sexual photographs that he would post online for people to buy. MV-1 needed money, so she agreed. MAHONE asked for images of her breasts and vagina, which she took and sent to him. MAHONE paid MV-1 \$50 through Apple Pay.
- d. MAHONE attempted to persuade MV-1 to engage in commercial sex acts. He told her they could split the money 50/50. But because the men that MAHONE wanted her to have sex with were older, MV-1 did not agree.
- e. MV-1 saw MAHONE using TextNow to communicate with older men about commercial sex dates with her.
- f. MV-1 first met MAHONE in person in January 2022. MAHONE told MV-1 that the purpose of the meeting was to take photographs of MV-1 that he could sell. For their first meeting, MAHONE picked

MV-1 up from her home at night and drove her to a hotel in Southfield. In a hotel room, MAHONE took explicit photographs of MV-1, including her genitals. MAHONE told MV-1 how to pose for the photographs. MAHONE also had sex with MV-1; he took photographs and videos of his sex with MV-1.

- g. MAHONE met MV-1 in person a second time. This time, he drove her to his house at 4703 Drexel, Detroit. Once at the Drexel Residence, MAHONE had sex with MV-1 and took photographs and videos of the sex acts. MAHONE also drove MV-1 to have her fingernails and toenails done. He explained to her that maintaining a good appearance was important when selling photographs of her.
- h. MAHONE met MV-1 in person for a third time. This meeting was in MAHONE's car.

20. In addition to the text messages described above, child pornography depicting MV-1 was recovered from MAHONE's cell phone extraction. Some of the child pornography contained on MAHONE's cell phone was sent by MV-1 to MAHONE in response to his messages, including six videos of MV-1 masturbating. The phone also contained six explicit photographs sent by MV-1 to MAHONE.

21. MAHONE's cell phone extraction also contained photographs and videos of MV-1 that appear to have been taken with and stored on MAHONE's phone. Specifically, MAHONE's phone contained photographs depicting MAHONE and MV-1 in a hotel room and in his residence. These images depict MAHONE engaged in sex acts with MV-1 and also depict MV-1's genitalia. These images meet the federal definition of child pornography.

22. Some of the child pornographic images on MAHONE's phone contain metadata showing that they were created by MAHONE's iPhone on January 29, 2022. GPS data embedded in the images show they were taken at the Best Western Premier Executive in Southfield, Michigan. These images depict MV-1's unclothed vagina and anus, as well as a photograph of MAHONE inserting his finger into MV-1's vagina.

23. Records obtained from the Best Western Premier Executive show that MAHONE rented Room 313 with a check-in date of January 28, 2022, and a check-out date of January 29, 2022.

24. Some of the child pornographic images on MAHONE's phone appear to have been taken inside of his Detroit residence. Metadata for these photographs show that they were created by MAHONE's iPhone on February 11, 2022. GPS data embedded in the images show they were taken at MAHONE's house. These images include depictions of MV-1's unclothed buttocks, anus, and vagina.

MegaPersonals Advertisements of MV-1

25. I located MegaPersonals posts depicting MV-1 that appear to advertise her for commercial sex. The posts are dated January 27, 2022 and January 28, 2022. Both advertisements listed the telephone number of 313-XXX-6894 as the means of contact for scheduling a commercial sex date with MV-1, as well as photographs of MV-1's unclothed breasts and a video depicting MV-1's vagina.

26. MegaPersonals provided information about the advertisements. Specifically, on or about January 27, 2022, user vicxxxxxxxxxx@gmail.com created a post with the title: "hey its KreamyK". The body of the message said: "follow my ig creamyk313 come see this creamy wet pussy I offer a non rushed service no raw no anal outcall requires a deposit." On or about January 28, 2022, user vicxxxxxxxxxx@gmail.com created a post with the title: "Incall/Outcall tight young pussy available." The body of the message said: "follow my ig creamykaybaby come see this creamy wet pussy I offer a non rushed service BBJ/BB services offered no anal outcall requires a deposit text me for my rates."

27. MAHONE's iPhone had the TextNow application installed. MAHONE's iPhone was using phone number 313-XXX-6894 to send and receive messages through TextNow. As stated above, the commercial sex advertisements for MV-1 listed phone number 313-XXX-6894.

28. The forensic extraction of MAHONE's iPhone also recovered text messages within the TextNow application. Those messages appear to discuss commercial sex dates with customers responding to the MegaPersonals advertisements depicting MV-1. During these conversations, MAHONE provided the men with pricing for specific sex acts, to include unprotected sex with the MV.

29. In response to a subpoena, Green Dot Bank, which operates Apple Cash, provided information about MAHONE's account. The records showed that MAHONE sent eight payments to MV-1 between January 26, 2022 and January 28, 2022 for a total of \$110.00.

30. MAHONE has three felony convictions, including a conviction for criminal sexual conduct, first degree, for which he received a sentence of 6 to 40 years. MAHONE's criminal convictions relate to his 2009 sexual assault and robbery of a commercial sex worker, which he and another man committed inside of a Southfield hotel room after scheduling a commercial sex date with her. MAHONE was discharged from his sentence on December 18, 2020. As a result of his conviction for criminal sexual conduct, first degree, MAHONE is required to register as a sex offender.

31. When MAHONE's person was searched on June 14, 2022, law enforcement located the following in his wallet: (1) a Visa debit card in the name of DH; (2)

Michigan EBT Bridge Card in the name of DH; (3) and CashApp Visa Debit Card in the name of DH.

32. I have identified DH to be a current inmate with the Michigan Department of Corrections. DH has been incarcerated since on or about March 13, 2014. DH is currently incarcerated for three counts of MCL 750.157Q—Financial Transaction Device; Illegal Sale/User, and one count of MCL 750.529—Armed Robbery. According to MDOC's records, DH earliest release date is in 2032.

33. During MAHONE's interview on June 14, 2022, he admitted that he illegally used a Bridge card in the name of DH and said the card and credit cards were mailed to his Drexel Residence.

34. In April 2023, I received records from an Investigator with Michigan's Department of Labor and Economic Opportunity Unemployment Insurance Investigations for DH. The records reflected that despite DH being incarcerated since 2014, an unemployment claim for him was filed in May of 2020. The claimant provided an address of **** Drexel, Detroit, Michigan. This is MAHONE's residence. The records reflect the claimant received payments for 40 weeks with a potential loss amount of \$34,120.00.

35. In April 2023, I received records in response to a subpoena from the Michigan Department of Health and Human Services (DHHS) for DH. Those records reflected that in December 2020, despite Holt being incarcerated since

2014, he applied for the MI Bridges Food Assistance Program and Home Heating Credit. The application listed DH's address as the Drexel Residence, his telephone number as 313-XXX-6894 (the TextNow telephone number used by MAHONE and the telephone number in the commercial sex advertisements of MV-1).

CONCLUSION

36. Based on the foregoing, there is probable cause to believe that Lance Craig Mahone Jr. is in violation of 18 U.S.C. § 2251 (sexual exploitation of children); 2252A(a)(2) (distribution and receipt of child pornography); 2250 (failure to register as sex offender); 2260A (penalties for registered sex offenders); 1591. 1594 (sex trafficking of a minor, attempt); and 1028A (aggravated identity theft).

Respectfully submitted,



Jeremy Jaskulski, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.


HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

DATE: October 26, 2023